

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re : Chapter 11
TERRAFORM LABS PTE. LTD., : Case No. 24-10070 (BLS)
Debtor.¹ :
: Consideration of the Wintermute Order
: Proposed Obj. Deadline: Feb. 23, 2024 at 4:00 p.m. (ET)
: Proposed Hr'g Date: Feb. 28, 2024 at 1:00 p.m. (ET)
: Consideration of the Litigation Payment Order
: Obj. Deadline: Feb. 27, 2024 at 4:00 p.m. (ET)
: Hr'g Date: Mar. 5, 2024 at 2:30 p.m. (ET)
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NOTICE OF MOTIONS AND HEARINGS

PLEASE TAKE NOTICE that, on February 13, 2024, Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the *Motion of Debtor for Entry of Orders Pursuant to Sections 363, 503(b), and 105(a) of the Bankruptcy Code Authorizing Debtor to Pay Certain Amounts in Furtherance of Litigation and Granting Related Relief* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Motion as Exhibit A was the *Order Pursuant to Bankruptcy Code Section 363 Authorizing Debtor to Pay Certain Amounts in Furtherance of Litigation and Granting Related Relief* (the “**Litigation Payment Order**”) and attached to the Motion as Exhibit B was the *Order Pursuant to Bankruptcy Code Section 363 Authorizing Debtor to Pay (I) Wintermute Costs and (II) Granting Related Relief* (the “**Wintermute Order**”).

The Wintermute Order and Motion to Shorten

PLEASE TAKE NOTICE that contemporaneously with the filing of the Motion, the Debtor also filed a motion to shorten the notice and objection periods with respect to consideration

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

of the Wintermute Order (the “**Motion to Shorten**”).

PLEASE TAKE FURTHER NOTICE that, if the Court grants the relief requested in the Motion to Shorten: (i) a hearing to consider entry of the Wintermute Order will be held on **February 28, 2024 at 1:00 p.m. (ET)** before The Honorable Brendan L. Shannon at the Court, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801, and (ii) any responses or objections to entry of the Wintermute Order must be filed by **February 23, 2024 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that if the Court denies, in whole or in part, the relief requested in the Motion to Shorten, parties-in-interest will receive separate notice of the Court-approved objection deadline and hearing date for consideration of the Wintermute Order.

The Litigation Payment Order

PLEASE TAKE NOTICE that a hearing to consider entry of the Litigation Payment Order will be held on **March 5, 2024 at 2:30 p.m. (ET)** before The Honorable Brendan L. Shannon at the Court, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801, and any responses or objections to entry of the Litigation Payment Order must be filed by **February 27, 2024 at 4:00 p.m. (ET)**.

Dated: February 13, 2024
Wilmington, Delaware

/s/ Matthew P. Milana

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*Proposed Attorneys for Debtor
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